

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

IN RE:	§	
	§	
WILLIAM CHARLES HUDSON	§	CASE NO. 15-90156
XX-XXX9602	§	
1212 PINE SHADOWS, NACOGDOCHES, TX	§	CHAPTER 7
	§	
DEBTOR	§	
<hr/>		
ALAN DOYLE LUCAS	§	
Plaintiff	§	
	§	
VS.	§	ADVERSARY NO. 15-9005
	§	
WILLIE HUDSON	§	
Defendant	§	

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff requests the Court to render a default judgment pursuant to BR 7055:

1. Plaintiff is Alan Doyle Lucas. Defendant is William Charles Hudson a/k/a Willie Hudson.
2. On December 8, 2015, Plaintiff filed Original Complaint to Determine Dischargeability of a Debt Pursuant to 523(a)(6) Bankruptcy Code. On April 9, 2016, the Court entered an Entry of Default by Court (Doc #8)
3. Defendant did not file a responsive pleading to the Complaint or otherwise make a defense to this adversary proceeding. Plaintiff now requests the Court to render a default judgment.
4. Defendant is not a minor or an incompetent person. Defendant is not in military service. (Declaration of Alan Doyle Lucas attached as Exhibit A)

5. Plaintiff seeks unliquidated damages against Defendant in an undetermined amount and will seek modification of the automatic stay (362 BC) to allow the trial of the state court action to determine the amount of damages. Copy of Plaintiff's Second Amended Petition attached as Exhibit B.

6. As proof that Plaintiff is entitled to a judgment that Defendant is not discharged pursuant to 523(a)(6) BC as to Plaintiff's claim, Plaintiff submits the Declaration of Plaintiff.

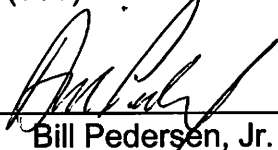
7. Plaintiff requests the Court enter a Default Judgment in favor of Plaintiff. A copy of the proposed Default Judgment is submitted herewith.

Dated: May 2, 2016

Respectfully submitted,

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By



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